

**COMMONWEALTH OF MASSACHUSETTS  
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

D.T.E. No. 99-271

COMMENTS BY AT&T COMMUNICATIONS OF NEW ENGLAND, INC.,  
REGARDING KPMG'S EXCEPTION NO. 10

**KPMG Exception No. 10**      KPMG reported that HP observed inconsistencies in certain versions of Bell Atlantic's (BA) Pre-Order Business Rules for LSOG 3 and EDI Guide. It identified 27 areas of inconsistencies.

Domain:                      Pre-Order, Order and Provisioning (POP)

KPMG Assessment:        KPMG concluded that given these inconsistencies, a CLEC would not be able to properly format the EDI transactions and exchange correct data with BA.

Date of Exception:        June 19, 2000

Date of BA Response:     June 28, 2000

Date of AT&T Comments:   July 20, 2000

**AT&T Comments:**

KPMG, once again, has identified where Bell Atlantic's documentation is either inconsistent or inaccurate. This comes after many months of Bell Atlantic documenting business rules and guidelines to assist CLECs entering the local services market in all of the Bell Atlantic local serving areas. It is clear that BA places little or no importance on **quality** documentation, yet these same documents are a crucial part of the CLECs' market entry process. Since it began recording its observations in Massachusetts in October of 1999, KPMG has made over 29 observations, with multiple sub-areas, where Bell Atlantic has failed to provide quality documentation. CLECs cannot communicate efficiently and readily with Bell Atlantic via its systems or personnel when such an important part of communicating is rife with errors.

Where a number of the documentation observations listed may be less customer-affecting than others observed by KPMG, in the long run, CLECs are hampered in their efforts to compete with BA because documentation is poor. Repeated poor documentation can cause delays in order provisioning, misunderstanding of rates and charges, and the building of incorrect systems where documentation for systems specifications is bad.

The underlying focus of the Third Party OSS test is to identify issues in a test mode. KPMG has found these inconsistencies or inaccuracies in the test mode where KPMG is focussing on finding issues. In a commercial environment where the focus is on production and not necessarily on finding documentation inconsistencies, the problems are not known until it is often too late, i.e. when something does not work. The CLECs do not know of inaccuracies or inconsistencies until the actual customer or systems impacts are felt.

AT&T recommends that KPMG:

- (1) Ensure that all observations, found in this OSS test, where BA's documentation has been inconsistent or inaccurate, have been corrected;
- (2) do not declare the documentation observations settled until such time that the corrections are made;
- (3) institute a **Quality** control process for documentation in which BA demonstrates compliance. Such quality control mechanism for documentation should be a part of KPMG's final recommendation to the MA DTE.